

EXHIBIT J

From: Andrew Brettler abrettler@berkbrettler.com

Subject: Re: Bonnell / Doe

Date: October 3, 2025 at 3:23 PM

To: Carlos Garcia Perez cgarciaperez@smgqlaw.com

Cc: petersjoan petersjoan@bellsouth.net, Gustavo D. Lage GLage@smgqlaw.com, Andrea Garcia agarciaw2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino Ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Carlos:

We aren't confusing the issues. We're trying to schedule Mr. Bonnell's deposition and Plaintiff's deposition around the same time, in Miami, for practical reasons.

In that regard, Plaintiff can either appear for an in-person deposition during the week of Nov. 3, if Mr. Bonnell's deposition is going to take place on Nov. 6, or she can appear for deposition in Miami on Nov. 24, if Plaintiff wishes to take Mr. Bonnell's deposition there on Nov. 25. If your client is unwilling to sit for an in-person deposition in Miami—where she filed her lawsuit—anytime this month, we are not going to agree to produce Mr. Bonnell for an in-person deposition in Miami on Nov. 6 only to have to fly back there two weeks later to take Plaintiff's deposition. Plaintiff's position is simply unreasonable.

Happy to discuss by phone in advance of Mr. Bonnell seeking relief from the Court. Please advise of your availability for a meet and confer call on Monday. Thank you.

Sincerely,

Andrew B. Brettler | BERK BRETTLER LLP
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On Oct 3, 2025, at 1:46 AM, Carlos Garcia Perez <cgarciaperez@smgqlaw.com> wrote:

Good morning I hope everyone is doing well.

Let's please not confuse the issues. Your client's deposition is set for November 6 as agreed by the parties. The issue is the method and dates of our client's deposition. You now have 5 dates to pick when to depose our client. Please let us know when you are going to take her deposition.

As to the hardship, it's the negative impact that it will cause on her studies, among other issues. I hope we can all appreciate and understand that being the case. Again your client's depo is set for November 6, please let us know when you are going to take our client's deposition. Thank you and I hope you have a good day. Carlos

CARLOS A. GARCIA PEREZ, ESQ.

[image001.jpg](#)

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On Oct 2, 2025, at 5:24 PM, Andrew Brettler <abrettler@berkbrettler.com> wrote:

SECURITY NOTE: *This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links *

Carlos:

Regardless of where Plaintiff now resides, she filed this lawsuit in the Southern District of Florida. Our client is entitled to take her deposition there, in person. Her argument that it would be an undue burden to sit for a deposition in Miami because it would force her to miss classes just doesn't fly.